

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES  
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF ADAM D. WALTER REGARDING:  
(A) CONTINUED DISSEMINATION OF NOTICE; (B) UPDATE ON CALL CENTER  
SERVICES AND SETTLEMENT WEBSITE; AND (C) REPORT ON REQUESTS  
FOR EXCLUSION RECEIVED**

I, Adam D. Walter, declare as follows:

1. I am a Director at A.B. Data, Ltd.’s Class Action Administration Division (“A.B. Data”), whose corporate office is located in Milwaukee, Wisconsin. A.B. Data was retained by Lead Counsel to serve as the Claims Administrator in connection with the Settlement of the above-captioned action (“Action”).<sup>1</sup> I submit this Declaration as a supplement to my previously filed declaration, the Declaration of Adam D. Walter Regarding: (A) Dissemination of Postcard Notice and Notice Packet; (B) Publication of the Summary Notice; (C) Establishment of Call Center Services and Settlement Website; and (D) Report on Requests for Exclusion Received to Date, dated August 14, 2024 (Dkt. 166-3) (“Initial Mailing Declaration”). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

**CONTINUED DISSEMINATION OF NOTICE**

2. Since the execution of the Initial Mailing Declaration, A.B. Data has continued to disseminate notice in response to requests from potential Settlement Class Members and Nominees. Through September 12, 2024, A.B. Data has disseminated an aggregate of 243,407 Postcard Notices and 5,053 Notice Packets to potential Settlement

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated as of May 7, 2024 (Dkt. 162-2), or in the Initial Mailing Declaration (defined herein).

Class Members and Nominees via First-Class Mail.<sup>2</sup> In addition, 176,191 potential Settlement Class Members received a link to the Notice and Claim Form via email.

**UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE**

3. A.B. Data continues to maintain the case-specific, toll-free telephone number (1-877-311-3740) with interactive voice response system (“IVR”) and live operators, along with the case-dedicated email address ([info@ApacheSecuritiesSettlement.com](mailto:info@ApacheSecuritiesSettlement.com)), to accommodate inquiries about the Action and the Settlement from potential Settlement Class Members. A.B. Data has promptly responded to each telephone and email inquiry and will continue to respond to these inquiries until the conclusion of the administration.

4. A.B. Data also continues to maintain the dedicated Settlement website, [www.ApacheSecuritiesSettlement.com](http://www.ApacheSecuritiesSettlement.com), to further assist potential Settlement Class Members. On August 16, 2024, A.B. Data posted to the Settlement website copies of the papers filed in support of Lead Plaintiffs’ motion for final approval of the Settlement and Plan of Allocation and Lead Counsel’s motion for attorneys’ fees and Litigation Expenses. On September 11, 2024, A.B. Data posted to the Settlement website the Zoom link for those Settlement Class Members wanting to participate in the September 19, 2024 Settlement Hearing remotely.

5. A.B. Data will continue maintaining and, as appropriate, updating the toll-free telephone number/IVR and Settlement website until the conclusion of the

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<sup>2</sup> A.B. Data has re-mailed 2,482 Postcard Notices to persons whose original mailings were returned by the U.S. Postal Service (“USPS”) as undeliverable and for whom updated addresses were either provided to A.B. Data by the USPS or obtained by A.B. Data through a third-party vendor.

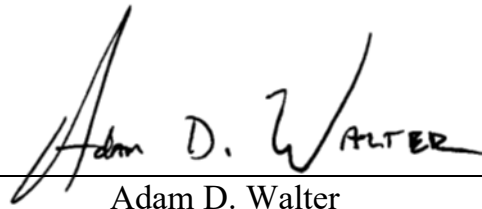
administration.

**REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

6. The notices and Settlement website informed potential Settlement Class Members that requests for exclusion from the Settlement Class were to be addressed to *Apache Corp. Securities Litigation*, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217, and received no later than August 29, 2024. A.B. Data has monitored all mail delivered to the P.O. Box for the Settlement. As of the date of this Declaration, A.B. Data has received nine (9) requests for exclusion from the Settlement Class. All nine requests for exclusion were received on or before the August 29, 2024 deadline. A list of the individuals and entities requesting exclusion from the Settlement Class and their city and state (if provided in the exclusion request) is attached hereto as Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of September 2024.

  
Adam D. Walter

**Exhibit 1**

1. Glenn Mackowski  
Brentwood, TN
2. Francis Caruso
3. Janyth O. Robertson  
Batesville, MS
4. Mark Ryding Søndersted  
Copenhagen, Denmark
5. Elizabeth G. Scoda  
Hardeeville, SC
6. Estate of Beryl Kelly  
c/o Steve Kelly  
Ottawa ON, Canada
7. Tom Taylor  
Dodge City, KS
8. Ganapathy R. Sankaran  
McMinnville, TN
9. Klick USA, Inc.  
New York, NY